

INDEX OF EXHIBITS ATTACHED TO PRETRIAL REPORT

Exhibit A, The Brief of City Defendants in Support of Applying the Fourteenth Amendment “Deliberate Indifference” Standard to the “Failure-to-Provide-Medical-Care-Claims,” Rather than the Fourth Amendment “Objective Reasonableness” Standard, During the Upcoming Trial of this Matter.

Exhibit B, Plaintiffs’ Brief in Opposition to the City Defendants’ Argument that the Fourth Amendment Does Not Apply to this Matter.

Exhibit C, The Declaration on Robert E. Barnes in support of Plaintiffs’ Brief in Opposition to the City Defendants’ Argument that the Fourth Amendment Does Not Apply this matter.

Exhibit D, The Parties Witness and Exhibit Lists.

Exhibit E, Joint Proposed Voir Dire.

Exhibit F, Joint Proposed Substantive Jury Instructions with indication as to whether the parties agree or disagree on the particular instruction.

Exhibit G, Plaintiffs’ Brief in Opposition to County Defendants’ Proposal to add language to Seventh Circuit General Instruction 7.11 Fourth Amendment: Medical Care.

Exhibit H, Memorandum of Law of Defendants Cheryl Wenzel and Nichole Virgo Regarding Jury Instruction on Medical Care for Arrestees.

Exhibit I, Plaintiffs’ Brief in Opposition to County Defendants’ Proposal to Remove Language from the Seventh Circuit General Jury Instruction 7.26 Damages: Compensatory.

Exhibit J, Memorandum of Law of Defendants Cheryl Wenzel and Nichole Virgo Regarding Proposed Compensatory Damages Instruction.

Exhibit K, Plaintiffs’ Brief in Support of James Franklin Perry Jr.’s Claim for the Loss of Society and Companionship of his Father.

Exhibit L, Memorandum of Law of Defendants Cheryl Wenzel and Nichole Virgo in Opposition to Proposed Jury Instruction on Damages for Loss of Society and Companionship on Behalf of JFP, JR.

Exhibit M, Plaintiffs’ Brief in Response to Defendants’ Proposed Striking of Seventh Circuit General Jury Instruction 1.26 Dismissed/Withdrawn Defendant from the Jury Instructions.

Exhibit N, Memorandum of Law of Defendants Cheryl Wenzel and Nichole Virgo in Opposition to Including an Instruction on Dismissed Defendants.

Exhibit O, Joint Proposed Verdict Form

Exhibit P, Plaintiffs’ Brief in Regard to Defendants’ Proposed Inclusion of Comparative Liability on Verdict Form.

Exhibit Q, Memorandum of Law of Defendants Cheryl Wenzel and Nichole Virgo in Support of an Apportionment Question on the Verdict Form.

Exhibit R, City Defendants Proposed Special Verdict Form.

Exhibit S, Plaintiffs' Certification of good faith attempts to resolve issues identified in the pretrial report.

Exhibit T, County Defendants' Certification of good faith attempts to resolve issues identified in the pretrial report.

Exhibit U, City Defendants' Certification of good faith attempts to resolve issues identified in the pretrial report.